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November 28, 2018

Via ECF/CM

The Honorable Edgardo Ramos
United States District Court
for the Southern District of New York
40 Foley Square
New York, NY 10007

Re: *United States v. El Gammal*, 15-cr-588 (S.D.N.Y.) (ER)

Dear Judge Ramos:

Our client Ahmed el Gammal is scheduled to be sentenced on December 18, 2018. Under this Court's sentencing practices, the defense sentencing submission is due two weeks before the hearing, on December 4, 2018, and the government's submission is due one week after that, on December 11, 2018. The defense, however, is awaiting one set of materials relevant to our sentencing arguments. We expect to have those materials in hand by the middle of next week, which would be too late to use them in our sentencing submission were we to file by December 4, 2018.

In order to adequately incorporate information from all relevant materials into our sentencing argument, we respectfully ask that the Court keep the sentencing hearing as scheduled for December 18, 2018, but allow the defense to file its sentencing memorandum (along with supporting exhibits) on Friday December 7, 2018, and extend the period of time the government has to respond until December 13, 2018. I have corresponded with the government about this request, and have been told that they have no objection to it.

Respectfully submitted,

/s/ Megan W. Bennett
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